



STATE OF CONNECTICUT

PUBLIC UTILITIES REGULATORY AUTHORITY
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DOCKET NO. 20-05-13 PURA STUDY OF COMMUNITY CHOICE AGGREGATION

November 3, 2021

By the following Commissioners:

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REPORT

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REPORT

I. INTRODUCTION

A. SUMMARY

In response to a petition submitted by People's Action for Clean Energy and Eastern CT Green Action (Petitioner or PACE), the Public Utilities Regulatory Authority (Authority or PURA) conducted a study (Study) to examine the potential opportunities and challenges associated with the implementation of community choice aggregation (CCA) for the State of Connecticut. In its most simple definition, CCA gives local government entities the opportunity to purchase, or procure, electricity on behalf of retail customers in a specified geographic area.¹

Figure 1: Community Choice Aggregation



NREL Study, p. iv.

This report summarizes the Authority's findings, as well as the comments offered by stakeholders and participants in this proceeding. The Authority does not take a position on the adoption of a CCA program in Connecticut at this time. Rather, the Study identifies key issues that decision-makers should consider when evaluating or enabling the potential implementation of CCA in the State. The Authority appreciates the efforts of the Petitioner and all other docket Participants who engaged in this proceeding to assist in the development of this report.

B. BACKGROUND

By letter dated May 25, 2020, PACE petitioned the Authority to conduct a study that addresses potential challenges and opportunities presented by CCA. On May 27, 2020, the Authority established this proceeding.

Technical meetings were held by the Authority via teleconference on July 14, 2020 (July Technical Meeting), September 28, 2020 (September Technical Meeting), and November 17, 2020 (November Technical Meeting). The Authority and other docket Participants conducted discovery throughout the proceeding, including through the

¹ See, National Renewable Energy Laboratory, Community Choice Aggregation: Challenges, Opportunities, and Impacts on Renewable Energy Markets (NREL Study), dated February 2019, available at: <https://www.nrel.gov/docs/fy19osti/72195.pdf>.

Authority's request for written comments, which were received on or about September 21, 2020.

At the July Technical Meeting, PURA facilitated a discussion to help frame the scope and objectives of such study. At the September Technical Meeting, the Petitioner and Community Choice Partners (CCPartners) assembled a panel of witnesses² who provided several presentations regarding CCA adoption and implementation in other jurisdictions. At the November Technical Meeting, the Authority addressed topics implicated by the adoption of CCA, such as standard service, consumer protection, and ratepayer impacts. At the Petitioner's request, the November Technical Meeting was attended by former New Hampshire Public Utilities Commissioner Clifton Below, who had recently authored CCA enabling legislation and participated to discuss issues pertaining to interval metering, billing, and rule drafting.

C. PARTICIPANTS

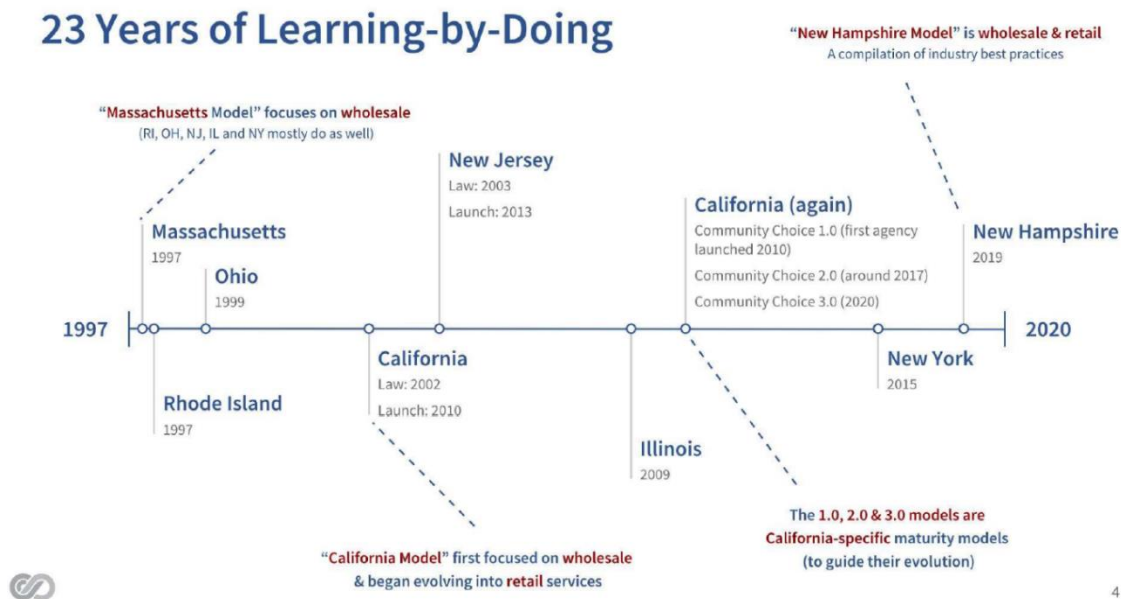
The Authority recognized the following as Participants to this proceeding: People's Action for Clean Energy / Eastern CT Green Action, 122 Dog Lane, Storrs, CT 06268; the Commissioner of the Department of Energy and Environmental Protection, 79 Elm Street, Hartford, CT 06106; Office of Consumer Counsel, Ten Franklin Square, New Britain, CT 06051; Eversource, 107 Selden Street, Berlin CT 06037; The United Illuminating Company, 180 Marsh Hill Road, Orange, CT 06477; Concentric Energy Advisers, 1300 19th Street NW Suite 620, Washington, DC 20036; Good Energy, LP (Good Energy), 232 Madison Avenue, Floor 3, New York, NY 10016; Direct Energy Business, LLC, and Direct Energy Services LLC, 280 Trumbull Street, Hartford, CT 06103; Constellation New Energy (Constellation), Inc., 1310 Point Street, 8th Floor, Baltimore, MD 21231; Institute for Local Self-Reliance, 2720 E 22nd Street, Minneapolis, MN 55406; Vistra Corp., 242 Trumbull Street, Hartford, CT 06103; Fuel Cell Energy, Inc. 3 Great Pasture Road, Danbury CT 06810; Vista Corp., 1005 Congress Avenue, Suite 750, Austin, TX 78701; Calpine Retail Holdings, LLC 242 Trumbull Street, Hartford CT 06103; and Community Choice Partners, Inc. 12 South Spring St. Concord, NH 03301

II. DEFINING COMMUNITY CHOICE AGGREGATION

A. HISTORY

CCA is not a new concept; however, the defining characteristics of CCA programs have not remained static since the CCA model was first introduced in Massachusetts in 1997. Indeed, there is a spectrum of CCA frameworks, and the functions of CCA have evolved over time as nine states have adopted various approaches. Figure 2, developed by Community Choice Partners, depicts a timeline of community choice in its various forms over more than two decades.

² Presentations were offered by a panel of witnesses, including: D. Maurice Kreis (New Hampshire Consumer Advocate), Maggie Downey (Administrator of the Cape Light Compact), Girish Balachandran (CEO of Silicon Valley Clean Energy), Matthew Marshall (Executive Director of the Redwood Coast Energy Authority), Nick Chaset (CEO of the East Bay Community Energy Authority), John Farrell (Director of Energy Democracy at the Institute for Local Self-Reliance), Oksan Bayulgen (Assistant Professor, University of Connecticut) and Lorenzo Kristov (formerly Principal, Market & Infrastructure Policy, California Independent System Operator).

Figure 2: History of CCA Implementation

Samuel Golding Presentation dated 9/25/20, p. 4, filed by PACE.

B. OVERVIEW OF BASIC CCA STRUCTURE

In a restructured electricity market, such as Connecticut, CCA would allow a municipality or group of municipalities to procure bulk power on behalf of residents, businesses, and municipal entities (collectively, retail electricity customers) in a specific geographic area while still receiving distribution and transmission services from the electric distribution company (EDC). NREL Study, pp. 1-2. Retail electricity customers within the footprint of the CCA must often actively opt *out* of the program, otherwise enrollment in the program is automatic. *Id.*, p. 2. As such, the formation of a CCA generally requires a public referendum, a vote by the local governmental body, enabling legislation, or some combination thereof. *Id.*

In terms of available administrative frameworks, a CCA program may be managed directly by a municipality (or a similarly situated local governmental entity), or by a third-party brokerage service.³ *Id.*, pp. iv, 2. The latter can be leveraged in several administrative models; however, it is more commonly associated with earlier iterations of CCA. *Id.*, p. 2. The former framework is often facilitated through the creation of a Community Power Agency (CPA), wherein multiple municipalities may also jointly execute an intergovernmental agreement in order to incorporate a separate legal entity, to which participating jurisdictions jointly grant powers to provide CCA services. PACE Written Exceptions, October 26, 2021, p. 17. Depending upon the state in question, and the statutory authorities that provide for the joint exercise of powers by municipalities and

³ The outsourcing of oversight and operations to a third-party brokerage service was more prevalent in earlier iterations of CCA models. Petitioner Response to Interrogatory CAE-1, p. 2.

other public agencies, such as intergovernmental agreements and the corresponding legal entity created are typically referred to either as (1) a joint powers agreement and Joint Powers Agency (JPA), or (2) a joint action agreement and Joint Action Agency (JPA). PACE Written Exceptions, October 26, 2021, p. 1. In both cases, the formation of such a joint entity is designed to achieve an economy of scale and scope of services. Petitioner Response to Interrogatory CAE-1, p. 2; NREL Study, p. 23.

In addition to the variety of CCA administrative options, the services that CCA can enable or provide also range in complexity and benefits. In its most basic form, CCA would provide electric generation services⁴ to the applicable Connecticut retail electricity customers, supplanting standard service or supplier of last resort service that would otherwise be provided by the EDCs (or through another competitive third-party supplier).⁵ NREL Study, p. 2. Similar to other competitive suppliers, CCAs may determine, through the exercise of community “choice”, the mix of resources used to supply electric generation services to their customers, such as one or more offerings that contain environmental attributes, also referred to as a “green” product. *Id.*, p. 4. In all such cases, however, the CCA’s generation mix must comply, at a minimum, with the State’s Renewable Portfolio Standard (RPS) requirement.⁶ *Id.* Retail services are typically limited to the provision of call center support for program-related inquiries, as well as the interchange and management of retail customer data with the utility for billing and related purposes. Petitioner Response to CAE-1, p. 2.

A CPA expands on the business model functions of a traditional CCA to fulfill the role of the retail value chain. Petitioner Response to Interrogatory CAE-1, p. 1. A CPA may undertake the role of customer care, consolidated billing, meter reading, energy efficiency coordinator, municipal distributed energy resources (DER) programs coordinator and/or product marketing and innovation. *Id.* In the most advanced form, a JAA acting on behalf of multiple CPAs hires service providers to procure the resource portfolio and enter into hedging contracts on behalf of the member CPAs, and hires expert staff to manage operations, provide regulatory engagement, and oversee the evolution of retail services and local programs. *Id.*, p. 2. For simplicity, the Authority defaults to the term “CCA” throughout the Study, except in instances where the specific nature of a CPA business model or JPA administrative framework is discussed.

It is also important to distinguish what a CCA is not. Written Comments of the Office of Consumer Counsel (OCC), Sept. 21, 2020 (OCC Written Comments), p. 5. Even under a JAA or CPA model, the third-party entity would not assume control and ownership of the EDC’s infrastructure or investments. *Id.* CCA-enabling legislation does not equate to the municipalization of an EDC’s assets; rather, CCA provides an alternative to municipalization insofar as it enables a jurisdiction to exercise control over its electricity

⁴ Conn. Gen. Stat. § 16-1(a)(26) defines “electric generation services” as electric energy, electric capacity or generation-related services.

⁵ See, Conn. Gen. Stat. § 16-244c for a description of standard service and supplier of last resort service obligations currently delegated to the EDCs.

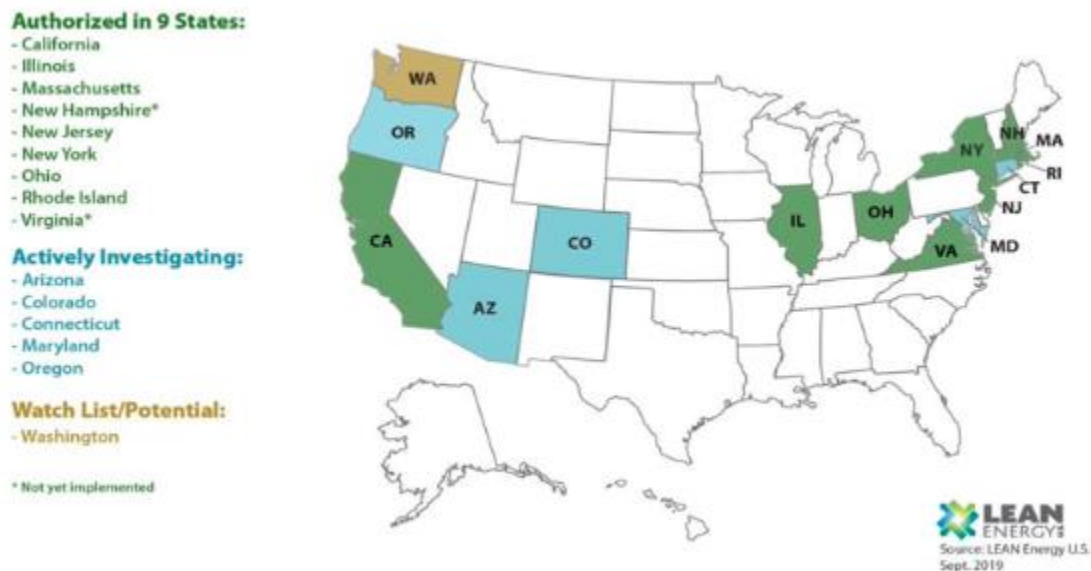
⁶ For calendar year 2021, not less than 22.5% of load must be sourced from Class I renewable energy sources, and an additional 4% must be sourced from Class I or Class II renewable energy sources. Conn. Gen. Stat. § 16-245a(a)(16).

supply without assuming control of local transmission and distribution obligations. NREL Study, p. 15.

C. CCA FRAMEWORKS IN OTHER STATES

In a 2019 report, the National Renewable Energy Laboratory (NREL) examined the CCAs active in eight states as of 2017. On October 1, 2019, New Hampshire became the ninth state to pass CCA-enabling legislation. Figure 3 provides an overview of the states that have authorized CCA or are currently exploring its implementation.

Figure 3: CCA Representation Across the United States



LEAN Energy U.S., Sept. 2019.

This Study reviews CCA frameworks implemented in certain other jurisdictions so that any potential future legislation can assess the appropriateness and applicability of various components to a Connecticut model. As discussed further below, this Study highlights four states – Massachusetts, California, New Hampshire, and New Jersey – that have employed varying approaches to implementing a community choice model. The Petitioner is a proponent of the New Hampshire model, Petitioner Response to Interrogatory CAE-1, while the Office of Consumer Counsel (OCC) prefers the New Jersey model adjusted for certain other provisions from Massachusetts – in the event that Connecticut opts to implement a CCA model at all. OCC Written Comments, p. 1.

1. Traditional CCA Model: Massachusetts

The Petitioner identified various forms and models of CCAs that have evolved over time in other jurisdictions, including a traditional CCA model, which the Petitioner defined as a program through which a municipality or group of municipalities buys bulk power on behalf of residents and businesses while still receiving distribution services from the existing utility. Petition, pp. 1-3. In a traditional CCA model, the EDC continues to bill and deliver electricity to its customers, and customers continue to call the EDC to report a power outage. *Id.* The Petitioner characterized Massachusetts' CCA model, passed

by the legislature in 1997, as an early, or traditional, CCA model. In such a set-up, the municipality would often hire a broker to manage the municipal aggregation, author the community aggregation plan, and contract with a competitive supplier; limited retail services (e.g., electronic data interchange and billing with distribution electric companies along with call center support) could be provided. Petitioner Response to Interrogatory CAE-1.

Under this scenario, the CCA operates within existing market structures and incumbent business models while allowing the municipality to offer certain simple products. *Id.* The Petitioner asserted that this type of CCA structure historically demonstrated that CCAs can produce moderate savings for communities, along with the provision of incremental Renewable Energy Certificate purchases and limited novel local programs. In the Petitioner's view, however, this form of CCA outsources too much, is oversimplified, and does not meet today's opportunities and challenges. *Id.* Further, PACE also stated that today's CPA/JPA model has evolved and that brokers no longer need to be relied on in any capacity. Petitioner Response to Interrogatory CAE-2.

According to the Petitioner, in Massachusetts most CCAs appear to rely on brokers for procurement advice and consulting services. The exception is the Cape Light Compact (CLC) Joint Powers Agency (JPA), which employs a Chief Procurement Officer and support staff along with consultants and legal support services. CLC administers energy efficiency programs and engages in regulatory proceedings for the purpose of consumer advocacy. Petitioner Response to Interrogatory CAE-6.

2. Community Power Agencies: California

The more recent form of community aggregation implementation is that of a CPA. Under this aggregation model, municipalities form CPAs that not only procure electric supply, but also offer retail services traditionally performed by EDCs, such as customer care, consolidated billing, meter reading, and energy efficiency programs. A CPA may also initiate DER programs and product marketing and innovation that provide additional value to the communities that they serve. Petitioner Response to Interrogatory CAE-1. Instead of utilizing brokers, the municipality hires expert staff to provide unbiased advice, regulatory engagement, and management of operations. California was the first state to initiate this type of community aggregation.⁷

According to the Petitioner, CPAs in California typically do not operate in isolation but instead form JPAs such that diverse types of communities can jointly benefit from leveraging economies of scale and a broader scope of services. Petitioner Response to Interrogatory CAE-1. There are twelve CCAs operating as JPAs, serving 176 municipalities in California, and nine single-city CCAs. Petitioner Response to Interrogatory CAE-6, p. 2. Instead of outsourcing operations to a competitive supplier, a variety of vendors are hired such that the JPA enterprise not only matches but exceeds the suppliers' in-house capabilities (in terms of commodity risk management and load

⁷ Note that the market structure of California is not directly comparable to that of Connecticut; thus, while examples and lessons learned from California are discussed in the Study, a direct implementation of the California CCA model is not technically or legally feasible at this time.

serving entity functions, retail meter data management, billing, and customer care services). Petitioner Response to Interrogatory CAE-1.

3. Joint Action Authority: New Hampshire

New Hampshire is the most recent state to pass community aggregation legislation, enacting a plan that built on the retail choice program set forth initially in 1996.⁸ The New Hampshire model is referred to as Community Power, distinct from the older conceptions of Community Choice and municipal aggregation before that.

The Petitioner proposed that the New Hampshire model is the most useful CCA model for Connecticut because it best reflects the accumulated experiences of other states. Petition, p. 1. The Petitioner cited several additional reasons why they are proponents of the New Hampshire law that enabled CCAs. First, the Petitioner stated that New Hampshire Senate Bill 286 granted municipalities full control over the entire retail value chain, including meter reading, consolidated billing, and related functions. PACE considers these functions to be the “missing links” that communities need to innovate freely in terms of retail demand flexibility and the integration of distributed energy resources. Second, municipalities were given the authority to form a JPA to operate on a statewide basis. The Petitioner opined that the JPA will provide unbiased expertise, regulatory engagement with an opportunity to create economies of scale in services to all member programs. The Petitioner also noted that the JPA is a separate shared services’ agency jointly owned and governed by participating aggregations. Further, the New Hampshire legislature passed a separate law during the same session to establish a Statewide Unified Data Platform to standardize and streamline access to retail electricity and natural gas usage data across all electric distribution company territories. Petitioner Response to Interrogatory CAE-1.

In summary, the Petitioner asserted that in their view, New Hampshire’s recent passage of Senate Bill 286 empowers local governments to become the default electricity provider for their residents and businesses, to competitively procure electricity supply, and to work with regulators, utilities, and competitive businesses to modernize the electrical grid and market infrastructure. Id.

As of this writing, CCAs in New Hampshire are not yet operational⁹ and adopting a framework based solely on this model would not be recommended at this time. As such, additional analysis pertaining to a fully functional New Hampshire CCA program should be considered before further action is taken.

⁸ See, LEAN Energy, New Hampshire (last updated Oct. 5, 2021), available at: <https://www.leanergyus.org/new-hampshire>.

⁹ While not yet operational, New Hampshire House Bill 315 (effective October 25, 2021) revised certain procedures applicable to CPAs, most notably a requirement for Electric Aggregation Plans to be approved by the New Hampshire Public Utilities Commission and the provision of Purchase of Receivables for CPA customers. See, http://gencourt.state.nh.us/bill_status/billText.aspx?sy=2021&id=527&txtFormat=pdf&v=current.

4. Government Energy Aggregation: New Jersey

The New Jersey Government Energy Aggregation Act of 2003 gave way for municipalities, either solely or in a group, to create CCA programs but with some provisions that shift slightly away from the traditional CCA model.¹⁰ In its infancy, the Government Energy Aggregation (GEA) program began as an opt-in option but is now operating under an opt-out model.¹¹ Introducing a new aggregation program relies on a majority vote from the municipality's governing body before being forwarded to the New Jersey Board of Public Utilities (NJBPU) for approval. LEAN Energy New Jersey, p. 1. After receipt of approval from the NJBPU, and completion of the energy procurement, the municipality can begin enrolling customers and processing any opt-out requests. *Id.* If the electric rate procured by the CCA is not lower than the current standard service rate, however, the aggregation is prohibited, and customers are returned to the standard service rate offered by the incumbent utility. *Id.* The one exception to this practice occurs when the aggregation program procures a higher percentage of "green energy" than currently required by the state's RPS. *Id.*

III. FACTORS TO CONSIDER IN EVALUATING CCA FOR CONNECTICUT

A. DEFINING THE STATE'S OBJECTIVES FOR CCA IMPLEMENTATION

The Authority recommends, in the event CCA enabling legislation is pursued in Connecticut, that the General Assembly clearly define through any enabling legislation its objectives for the proliferation of community choice aggregation in the State, including a ranking or prioritization of such objectives, if possible. Such an approach has been instrumental in guiding the program design and subsequent implementation of several recent legislative initiatives because defined objectives assist the Authority in resolving contested program design elements. *See, e.g.,* Public Act 21-53, An Act Concerning Energy Storage.

For purposes of this Study, the Authority invited comment from interested stakeholders regarding potential objectives of CCA implementation in Connecticut. While taking no position at this time, with respect to the various potential considerations and conditions, the Authority summarizes the information below in Table 1, with further discussion in subsequent sub-sections. As is evidenced in the summarized material, stakeholders view the potential objectives of CCA through different lenses, sometimes offering considerations that may be viewed as counterpoints or consequences of the desired objective.

¹⁰ *See*, New Jersey Board of Public Utilities, NJ Government Energy Aggregation – Program Summary, available at: www.state.nj.us/bpu/pdf/energy/NJ_Gov_Energy_Aggregation_Summary.pdf.

¹¹ *See*, LEAN Energy, New Jersey (last updated Sept. 7, 2021), available at: <https://www.leanenergyus.org/new-jersey>.

Table 1: Proposed Stakeholder Objectives

Potential CCA Objective	Potential Considerations	Stakeholders
Reduced Cost of Electric Supply	CCA model should lower rate for subscribers and not shift cost burdens to non-members.	OCC
	CCA model should have multiple rate offers, have flexibility, and not be based solely on “lowering rates.”	Good Energy, LLP, Vistra Corp.
	CCAs may increase load uncertainty and lead to risk of price volatility.	Eversource
Accelerated Reduction of GHG Emissions	A CCA program that brings more physical renewable resources would have a larger impact on GHG emission goals.	Eversource
GHG Emissions Con’t	CT has set significant climate goals, using the CCEO and VRO program. The CCA will need to complement current programs or offer more.	DEEP
Increased Local Benefits, including Creation of Advocates for Energy and Enhanced Local Economic Opportunities	CCAs should help to drive DER advancement and integration, as well as drive AML.	Eastern Green Action/PACE
	Legislation should evaluate whether CCA members would have access to ratepayer funded conservation programs offered by utilities.	Good Energy, LLP
	Any potential savings from a CCA program should get funneled back to members for investment.	Good Energy, LLP

1. Potential Objective: Reduced Cost of Electric Supply

The Petitioners asserted that reducing power supply costs is a primary objective of adopting a CCA model but cautioned that providing a lower cost option compared to the default supply service should not be a statutory requirement, as lower rates are only one component of the CCA value proposition. Written Comments of People’s Action for Clean Energy and Eastern CT Green Action, Petitioner Written Comments dated 10/2/20 (Petitioner Written Comments), pp. 1-2; Petitioner Response to Interrogatory CAE-3. The Petitioner acknowledged that while CCAs often secure cost savings for their customers, this is not always the case.

Other docket Participants highlighted examples of CCA models in Massachusetts and California that have successfully offered lower electric supply rates combined with increased renewable energy offerings. For example, in Massachusetts, CLC offers three tiers of pricing to its customers; a 100% renewable basic offering and two additional options that have 50% and 100% *local* renewable energy (emphasis added). Downey Presentation, p. 5. The CLC witness stated that approximately 65% of the time, its 100% renewable basic rate offering was lower than Eversource's standard service rate. *Id.*, p. 6.

In contrast, OCC surmised that a statutory requirement for a CCA to achieve guaranteed savings for customers on their generation supply costs "provides the exact sort of security that consumers will need in order to get behind a new energy program like CCA that is presently unfamiliar and potentially confusing to many customers." OCC Written Comments dated 9/21/20, p. 10. Under New Jersey's CCA model, a participating municipality is required to select a bid that provides savings to a customer's bill when measured against an administratively set generation price. *Id.*, p. 7. The OCC argued that, "New Jersey's program provides the most consumer-friendly blueprint insofar as monetary savings and lower generation rates are concerned." *Id.*, p. 8. In addition, OCC stated that New Jersey has limited exceptions for municipalities to procure generation supply that exceeds the state RPS requirements as compared to other CCA states, where municipalities are generally free to procure greener generation that may be more costly to ratepayers. *Id.* OCC firmly believes that "[a]s a State with some of the highest electric rates in the contiguous United States and an ongoing energy affordability crisis... any Connecticut CCA program should be *legally required* to immediately lower electric generation rates for CCA subscribers"¹² without placing the burden onto other ratepayers. *Id.*

Along those same lines, other docket Participants discussed the potential impact of a CCA program on non-participants, noting that widespread adoption of CCA will impact the EDCs' level of load certainty, which potentially could result in higher standard service rates offered by the EDCs.¹³ If CCAs are adopted in the State, the potential exists for communities to transition large volumes of customers from the standard service offering to a supplier selected by the CCA. That process may impact the EDCs' standard service load and associated procurement processes. AARP concluded that through the potential departure of a substantial number of households into a CCA program, increases the risk premium for non-CCA ratepayers. AARP Written Exceptions, dated October 26, 2021, p. 1

¹² *Id.* at 6-7.

¹³ The EDCs offer electricity to customers at a standard service rate, which is based on the price of the electric supply procured in the wholesale energy market. The process by which the EDCs procure energy has evolved since Connecticut's electric market was deregulated in 1999; however, the current power procurement plan has, with some modification, been in effect since 2006. Standard service is designed to be a competitive option in the marketplace and allows ratepayers a convenient way to purchase their generation service from the EDCs. There are two rate periods for electric supply in Connecticut: January through June, and July through December. The cost of electricity generation in the region is primarily driven by natural gas. Natural gas prices are typically lowest in the summer, and electric usage peaks in the summer, whereas natural gas prices often increase significantly during the coldest months of the year, and electric usage is typically lower through the winter months. As a result, the two rate periods were established with the intention that supply rates would be lower when customers are using the most electricity over the summer months compared to the January through June period. *Id.*, pp. 10-11.

Eversource stated that load certainty is the most important variable to the electric supplier selected through the EDC's procurement process to provide standard service to all customers who have not elected a retail electric supplier. Eversource Response to Interrogatory CAE-16. According to Eversource, since standard service suppliers must hedge the cost of their supply in advance of the service period, a large amount of customers leaving or returning to standard service relative to how much power they hedged in advance exposes suppliers to being long or short at potentially unfavorable prices. Id. If the exposure is great enough, standard service suppliers will either refrain from bidding or will add a premium to the bid price to cover the potential exposure. Id. Eversource suggested that if CCAs are adopted in Connecticut, the rules of aggregation should be designed in such a way as to limit the sign up or cancellation of entire towns' loads during periods for which standard service suppliers are bidding. If not, in their view, all standard service customers could experience higher prices. Id.

In response to the risk of CCA load returning or defaulting customers to standard service, Petitioner asserted that best practices in terms of how to design CPA administrative frameworks and business models provide for effective risk management and are stable enterprises. Petitioner Response to CAE-14, pp. 1-2.

UI opined that the adoption and implementation of CCAs in Connecticut would likely shift load away from the standard service offer to the CCA offer. UI Response to Interrogatory CAE-16. UI stated that in other states that have adopted an opt-out CCA program, when a community procures electric supply on behalf of the residents through a CCA offer, that offer becomes the default offer for that community. Id. All customers would be switched to the CCA offer, with an ability for individual customers to opt out. Id. UI claimed that while this would not impact the Company's procurement process, depending upon how the CCA is structured, it could impact the bids that it receives for standard service. Id. For example, if the standard service suppliers do not have sufficient notice when a CCA offer is created for a community, they may have power contracts for power they no longer need to deliver. Id. Without such notice, electric suppliers may have to adjust their bids to hedge for that possibility. Id.

To illustrate these points, Eversource conveyed their recent procurement experience in the Eastern Massachusetts region where CCAs are operating. During this time-period, the City of Boston was in the process of obtaining CCA approval from the Massachusetts Department of Public Utilities. Tr. 11/17/20, pp. 55-60. Eversource stated that the City of Boston's electric supply load is large, and that the EDC was obligated to notify wholesale electric suppliers of Boston's CCA application. Id. During this period, Eversource solicited bids for its standard service offering. Id. Eversource stated that wholesale suppliers were concerned because it was unknown when Boston would begin its CCA aggregation. Id. For this solicitation, the EDC experienced a decline in suppliers who submitted bids and the bids that were received covered a broad range of prices. Id. Eversource stated that National Grid experienced a similar circumstance in Worcester, Massachusetts. Id.

To counter such effects, Eversource suggested that CCAs in Massachusetts and New Hampshire could "sync up" or align the timing of CCA procurement with the standard service procurement timeline, where rates become effective January 1 and July 1 annually. Id., pp. 61-64. Eversource explained that presently, CCAs in Massachusetts

are not required to do so. Id. UI added that wholesale suppliers could be provided with plenty of advance notice to reduce uncertainty in the procurement process. Id. p. 69.

In rebuttal, the Petitioner asserted that any uncertainty created by the transition of a large community to a CCA would be temporary, and that eventually, suppliers would get used to the new load profile. Id. pp. 70-71. Further, the Petitioner questioned whether the Massachusetts' experience that Eversource discussed would apply in Connecticut. Id. The Petitioner argued that CCAs and the EDCs will be able to access the same power in the competitive wholesale market (not taking into account the timing of solicitations) and commented that no evidence has been provided that shows that CCAs will negatively affect the standard offer rates of non-participating ratepayers. Id. Additionally, Good Energy stated that CCAs do not increase standard service rates and can potentially lower these rates, particularly as "customers typically remain with the CCA for the term of the agreement lowering the risk to standard service providers and in turn lowering standard service rates." Good Energy, LP Written Comments dated 11/13/20, p. 3.

In summary, the Study yielded information both for and against the proposition that CCAs be *required* to reduce energy supply costs (rather than simply strive for such an outcome), as well as varying opinions as to whether adoption of a CCA model in Connecticut would have a negative impact on the energy supply costs of non-participants (as measured by the standard service rate). Given that the specifics of any CCA program implementation would likely drive the ultimate determination of this issue in Connecticut, the Authority declines to make any findings at this time; rather, the Authority recommends that the General Assembly, should it choose to promulgate enabling legislation, consider defining an objective with respect to the effect of CCA on energy supply costs of both participants and non-participants. Moreover, such legislation, and its resulting implementation, would need to address issues of load certainty and coordination with the EDCs' standard service processes, at a minimum.

2. Potential Objective: Furtherance or Acceleration of State Climate Goals

The Study also examined as a potential objective whether the adoption of CCA in Connecticut could or should be designed to enable the accelerated achievement of the State's ambitious climate goals.

The Petitioner noted that while achieving greenhouse gas (GHG) reductions through the deployment of additional renewable energy generating sources is important, the value proposition of establishing a CCA is broader. Petitioner Response to Interrogatory CAE-3. Indeed, the Petitioner advocated for Connecticut to adopt a more comprehensive model of CCA that would also allow municipalities to offer retail services, including energy efficiency programs, and provide supporting functions such as metering and consolidated billing. In Massachusetts, CLC offers energy efficiency services to the communities it serves. Downey Presentation, p. 3. In California, the Redwood Coast Energy Authority has directed more than \$30.4 million to procure power from local biogas plants, established a \$14.2 million contingency reserve fund available for customer rate-stabilization or other community priorities, and invested \$2.3 million in a local microgrid project. Petitioner Response to Interrogatory CAE-19.

Separately, DEEP highlighted a number of energy policies and programs enacted by the General Assembly that are intended to be supported by *all* EDC ratepayers because they benefit all state residents, including the Renewable Portfolio Standard (RPS), the Conservation and Load Management Plan, grid-scale procurements for clean and renewable energy, procurements of generation to relieve transmission congestion in southwest Connecticut, procurements of zero carbon resources, including nuclear resources, and distributed generation programs like the Residential Solar Investment Program (RSIP) and the Low and Zero Carbon Renewable Energy Credit Program (LREC/ZREC). DEEP Brief, p. 3. DEEP welcomed the opportunity to coordinate with municipalities to better implement existing state programs or go beyond state programs to achieve additional GHG reductions. *Id.* GHG reductions can be accomplished in a variety of ways, but DEEP cautioned that it is critical that any effort regarding CCA adoption support and leverage existing state programs and policies rather than subvert them. *Id.* Eversource echoed this sentiment, stating that a CCA framework in Connecticut should not result in counterproductive impacts to existing programs and policies. Eversource Written Comments dated 9/21/20, p. 9.

Like with other potential objectives of CCA proliferation, the definitive ability of CCA to realize this objective depends on the CCA model adopted in this jurisdiction. The Authority recommends that any enabling legislation address whether the objective of CCA is to accelerate State public policy goals, complement existing programs, or supplant existing programs. Put simply, in the view of Connecticut's General Assembly, is it the objective of a CCA program to provide incremental or complementary services (e.g., energy efficiency and DER incentive programs) to those available through programs overseen by state agencies; or is the CCA intended to administer such programs *in lieu* of participating customers' access to programs overseen at the state level? Resolving this question will drive the resolution of important program design parameters during the implementation process of potential CCA enabling legislation.

3. Potential Objective: Enhanced Local Control and Localized Benefits

Docket Participants also discussed the potential of CCA adoption to enhance local control and to increase other localized benefits. Various publications, including the 2019 NREL Study, have opined that the ability to exercise local choice and control over energy decisions is a primary selling point of CCAs among policymakers. NREL Study, p. 23. Legislative direction as to whether enhancing local control and associated benefits is an objective of CCA adoption in this State will guide the ultimate design of any such program.

The Petitioners emphasized that a key tenet of a CPA model is to develop DERs, which therefore create local jobs and other economic benefits. Petitioner Response to Interrogatory CAE-8. The Petitioners highlighted CCAs in California, some of which offer energy efficiency and demand response, solar incentives, and develop local solar plus storage systems. *Id.* According to the Petitioner, local DER deployments would result in local installation and maintenance-related jobs. *Id.*

DEEP noted that the Petitioner refers to decentralization of state energy policy as a benefit of more advanced CCA models because it leads to more local control. DEEP Brief, p. 4. DEEP posits that it is unclear how this objective would be realized in

Connecticut, given the amount of load that is projected to be under contract to zero carbon resources in 2025. Id. Citing the suite of energy policies that the General Assembly has enacted to date, DEEP concluded that Connecticut is already significantly on its way to achieving ambitious clean energy goals based on existing policies and programs. Id. DEEP opined that because all EDC ratepayers currently share the costs of those commitments, a model that exempts some ratepayers from paying those costs would necessarily shift more of those costs to others (i.e., CCA non-participants). Thus, in DEEP's view, a move to a significantly decentralized approach to energy policy in Connecticut could have several additional implications, including losing economies of scale, failure to implement best practices, difficulty in tracking results, and inequitable access to programs. Id.

The Authority defers to the General Assembly as to whether enhanced local control is an appropriate objective of CCA, and if so, to what degree the objective should be prioritized over others. If the General Assembly elects to prioritize enhanced local control as an objective of CCA, the Authority notes that additional consideration may need to be given to the interplay of different CCA administrative frameworks with existing state statutes. For example, the Petitioner raises consideration of several existing statutes outside of the Authority's current expertise as perhaps being implicated by questions surrounding CCA implementation. PACE Written Exceptions, October 26, 2021, p. 24. The Petitioner raises the following questions for consideration in any enabling legislation: (1) how different CCA administrative frameworks would enhance or diminish economies of scale, the coordination required to achieve state policies, and the promulgation of best practices; (2) whether the existing authorities governing interlocal agreements between municipalities, as provided for under Conn. Gen. Stat. § 7-148cc and § 7-339a through 7-339, are sufficient to support the objectives and corresponding governance structure if a CCA model is considered; and (3) whether enabling legislation should allow, or prohibit, municipalities to join together to form public corporations, as provided for municipal electric utilities under Conn. Gen. Stat. § Sec. 7-233a. Id.

B. CONSUMER PROTECTIONS

1. Opt-In vs. Opt-Out Model

A key consideration when developing a CCA framework is whether electric utility customers within a CCA's geographic footprint would be required to "opt in" to participate in the CCA, or whether customers must instead "opt out" of participating. NREL Study, p. 28. Under an opt-out model, customers who reside within a CCA community are automatically transferred to the default supply rate offered by their CCA. Id. Conversely, in an opt-in model, the CCA would compete with electric suppliers on an individual customer basis to obtain market share within the CCA. Individual customers would affirmatively select, or "opt in", to the CCA. There would be no automatic transfer of basic service customers from the EDC to the CCA under an opt-in model.

The OCC expressed support for an opt-in approach, noting that, in general, opt-in models provide greater consumer protections to ratepayers. OCC Presentation dated 09/28/20, p. 6; OCC Written Comments, p. 12. According to the OCC, "consumers at the individual level are best equipped to make choices about their household billing and energy needs and that mandatory enrollment in certain programs may produce results

that are disadvantageous or ill-equipped to aid individual ratepayers.” OCC Written Comments, p. 11. The OCC acknowledged, however, that opt-in CCA models have proved infeasible and unsustainable in other jurisdictions. OCC Written Comments, p. 12. Thus, if an opt-out model is ultimately considered, the OCC strongly advocated that “the legislative scheme contain multiple procedural safeguards to ensure that ratepayers in an aggregated municipality not only have a meaningful say in the decision to aggregate or not but also are sufficiently apprised of their rights and liabilities under a CCA scenario.” OCC Written Comments dated 9/21/20, p. 12.

The American Association of Retired People (AARP) strongly opposed an opt-out model. AARP asserted that requiring consumers to opt-out of any CCA scheme would be time consuming and confusing for individuals, especially those who are not familiar with policy or for whom English is a second language. AARP Written Comments dated 12/10/20, p. 1. Citing the results of a 2019 survey the organization conducted of 1,015 Connecticut registered voters ages 50 and older, AARP reported that 77% of respondents strongly opposed an opt-out CCA, and another 10% of respondents “somewhat oppose” an opt-out CCA. AARP Written Comments dated 12/18/20, p. 2. In addition, AARP recounted their commitment to working with policymakers to ensure a strong, affordable, and reliable standard service rate for all ratepayers, and argued this has not been achieved in other states that have pursued an opt-out CCA model. AARP Written Comments dated 12/10/20, p. 1. Furthermore, regardless of the desired opt-in/opt-out model, the potential for stranded costs resulting from the process is likely and may include costs associated with billing, metering, and program management. AARP Written Exceptions, October 26, 2021, p. 4. Specific policy addressing stranded costs will protect non-members and place the additional cost responsibility on the implementing entity. AARP Written Exceptions, October 26, 2021, p. 4.

Based on an examination of other states’ legislation and CCA experiences, an opt-out model is more conducive to CCA implementation. However, such an approach raises significant consumer protection issues as discussed by the OCC and AARP, which are evaluated further below. Moreover, as noted by AARP in earlier written comments, citing the results of a 2019 survey the organization conducted of 1,015 Connecticut registered voters ages 50 and older, AARP reported that 77% of respondents strongly opposed an opt-out CCA, and another 10% of respondents “somewhat oppose” an opt-out CCA. AARP Written Comments, December 18, 2020, p. 2.

2. Other Consumer Protection Issues

The OCC and AARP raised a myriad of consumer protection concerns regarding CCA adoption in Connecticut. To address these concerns, the OCC indicated support for the requirement in Massachusetts’ CCA legislation that prior to forming an aggregation, the voters of a municipality must approve the decision to do so at the polls via a referendum election. OCC Written Comments, p. 6. The OCC acknowledged that while some Connecticut towns and municipalities have expressed interest in forming a CCA, this does not equate to a referendum from the general populace of ratepayers who would ultimately bear the outcomes of CCA implementation. *Id.* The OCC also advocated that CCAs be required to guarantee a savings over the EDCs’ standard service offering. To support its position, the OCC pointed to the New Jersey CCA law that guarantees that

the aggregated CCA rate constitutes an actual bill savings against a benchmark generation rate. Id., p. 7.

The Petitioner agreed that including consumer protections is important in designing community power legislation and the subsequent CCA framework; nonetheless, the Petitioner argued that the inherent local nature of community power affords its customers more consumer protection than competitive suppliers or monopoly utilities, both of which are farther removed from their customers both geographically and administratively. According to the Petitioner, Community Power boards and the municipal political leaders who create them are more in touch with local customers and will suffer the consequences if a program goes awry. Petitioner Response to Interrogatory CAE-11. In addition, the Petitioner stated that since the establishment of a CCA is a lengthy and public process, community members would have the opportunity to discuss thoroughly the implications of an opt-out model. Petitioner Response to Interrogatory CAE-10.

At the September Technical Meeting, the Petitioner's witness from the Cape Light Compact (CLC) addressed the role of consumer advocacy as a potential consumer protection benefit associated with CCA adoption. According to CLC, its existence ensures that Cape Cod and Martha's Vineyard residents have a seat at the table at the state level, in technical dockets, in regulatory proceedings, and in front of the Massachusetts Department of Public Utilities. Tr. 09/28/20, p. 151. In addition, CLC highlighted its online resources that provide transparency and educate its customers to enable them to make informed choices. Id., p. 156.

C. CCA INTEGRATION AND REGULATORY OVERSIGHT IN A RESTRUCTURED MARKET

The Authority currently exercises broad regulatory powers over the State's two investor-owned electric utilities and retail electric suppliers. Designing legislation to enable CCA within Connecticut will require consideration of the degree of oversight that the Authority would exercise over the participating municipalities. The need for such oversight may be mitigated to some degree based on the governance structure of whatever CCA model is adopted; however, Connecticut will encounter certain integration challenges not experienced in other CCA jurisdictions.

1. CCA in a Restructured Market – Integration Considerations

Connecticut operates a restructured energy market, in which customers can access a range of options for procuring electric supply based on price, environmental attributes, and duration, either through the third-party electric supplier market, or by participating in the Voluntary Renewable Options Program, or by accessing one of the programs enabled by prior legislation (e.g., the Shared Clean Energy Facilities program). In a restructured market, CCAs act like retail electricity customers, essentially choosing a competitive supplier and entering a short-term contract for electricity service. NREL Study, p. 3.

a. Electric Suppliers and Aggregators

Connecticut has an active third-party electric supplier market, particularly with respect to the non-residential customer market. The electric supplier market allows customers a range of options for procuring electric supply based on price, environmental attributes, and duration. In 2020, approximately 24% of Eversource's residential load and 76% of Eversource's non-residential load was served by electric suppliers. Eversource Presentation dated 9/28/20, p. 3.

Additionally, the General Statutes of Connecticut (Conn. Gen. Stat.) § 16-245b authorizes a municipality to aggregate its electric generation services within its own boundaries, or within the boundaries of member municipalities in a consortium without obtaining a license from the Authority. To date, only twelve municipalities have obtained electric aggregator licenses from the Authority, but none are currently functioning as aggregators. Petitioner Response to Interrogatory CAE-1. Under Conn. Gen. Stat. § 16-245b, a municipal aggregator acts like any other aggregator and would solicit customers to become members of the aggregator and then market their customer base with the intent to obtain electric generation at the best price. Id.

In any resulting enabling legislation, the Authority recommends that the General Assembly consider the integration of CCAs into the existing retail energy market, including whether different program rules should be established vis-à-vis the residential and non-residential sectors, the impact of different program design options on existing supplier contracts, and the extension of consumer protections currently applicable to licensed electric suppliers. Additionally, such legislation should consider whether it is appropriate to retain the existing Conn. Gen. Stat. § 16-245b construct in the event that a more advanced CCA model is considered for the State.

b. Voluntary Renewable Options Program

Pursuant to Conn. Gen. Stat. § 16-244c, the Authority established the Clean Energy Options Program in 2005 to allow consumers to support renewable energy above the state-established minimum RPS. See, Decisions dated April 21 and October 20, 2004, and February 17 and April 21, 2005, in Docket No. 03-07-16, Investigation of Alternative Transitional Standard Offer Services for United Illuminating and CL&P Customers. In its October 21, 2020 decision in Docket No. 16-12-29, PURA Development of Voluntary Renewable Options Program (VRO Decision), the Authority modified and approved the continuation of the Clean Energy Options Program and established rules for all generation supply offers marketed as including renewable energy attributes that exceed the annual minimum requirement for renewable portfolio standards, commonly referred to as voluntary renewable offers (VRO). VRO Decision, p. 1.

In addition, the Authority determined that the modified Clean Energy Options Program will continue to provide customers who remain with their utility's standard service generation supply an option to support renewable energy through the purchase of renewable energy certificates. Id. The VRO Decision also established universal standards for the renewable energy certificates and voluntary renewable offers, including that the certificates that support such offers may originate only from the ISO New England, New York, or PJM control areas. Id. The Authority concluded that these changes will

further Connecticut's energy policies by reducing local greenhouse gas emissions and supporting local, sustainable, renewable energy sources. Id.

According to a recent NREL study, in 2017, 100 of the 750 active CCAs offered a voluntary "green power" product. NREL Study, p. 9. Depending on the jurisdiction, CCAs offer both opt-in and opt-out voluntary green power products, with voluntary green power sales through CCAs increasing from 2015 to 2017. Id. Of all voluntary CCA "green power" sales between 2010 and 2017, wind energy RECs account for approximately 78% of the portfolio with most non-California-based CCAs relying on nationally-sourced products – mostly from Texas. Id., pp. 10-11.

If the General Assembly pursues CCA enabling legislation, the Authority advises that the legislation, or subsequent program implementation, will need to resolve whether any applicable products offered by the CCA must conform to the marketing requirements adopted in the VRO Decision; absent contrary direction, the Authority opines that they would.

2. PURA Oversight

The Petitioner posits that the Authority should have regulatory oversight over CCAs for consumer protection issues only, arguing that CCA is distinct from other electric supplier models. See generally, Petitioner's Written Comments. Conversely, due to the potential effects on standard service and other State energy issues, OCC and the EDCs believe that the Authority would need to exercise a level of oversight similar to that which PURA exercises over the retail electricity market currently, which was recently expanded through Public Act 21-117, An Act Concerning Electric Suppliers.

The Authority respectfully suggests that the appropriate degree of regulatory oversight is inextricably linked to the scope of any legislatively established objectives for a Connecticut CCA program, as well as the certainty with which such objectives must be realized or adhered to in the General Assembly's view. For example, a legislative determination that a CCA must achieve a reduction in costs for participants while maintaining the status quo or a *de minimis* impact on non-participants will require PURA to design, oversee and enforce CCA program rules with a certain degree of rigor. Moreover, a clear delineation of responsibility for not only consumer protection issues, but consumer complaint issues, between the Authority and CCA municipalities will ensure a judicious use of limited resources. In short, there is flexibility surrounding the degree of regulatory oversight associated with the adoption of a CCA framework, which should be correlated by the General Assembly to whatever objectives are ultimately codified.

D. POTENTIAL PROGRAM IMPLEMENTATION

Depending on local ordinances, as well as the scope of authority delegated to the state regulatory body versus local municipalities, the overall governance structure and program design of a CCA framework can vary. As discussed throughout this proceeding, if the General Assembly elects to pursue CCA enabling legislation, Connecticut can (1) adopt a CCA framework promulgated by another similarly situated jurisdiction; (2) create a hybrid approach borrowing elements from multiple CCA approaches; or (3) design an entirely new approach. In any scenario, enabling legislation should consider the scope

of permissible CCA programming, as well as the desired level of regulatory oversight. Table 2 below outlines the potential implementation steps that would need to be considered; though, there is room for adjustments throughout. In short, the State could establish standards and guidelines, while delegating program management to municipalities with specific areas of oversight delegated to the Authority.

Table 2: Potential CCA Program Implementation Framework

Implementation Steps	Objectives	Key Implementers	Estimated Timeframe
Initial research	Learn about CCA and the potential role it could play in your community.		
Authorize CCA	Authorize development of an aggregation plan by majority vote in a city council or town meeting.	City Council or Town Meeting	1 month
Issue RFP for energy broker (optional)	Hire a broker for assistance in the design, implementation, and ongoing monitoring of the aggregation plan.	Town Administrator or Energy Planner	2 months
Develop aggregation plan with state input	Draft a plan with input from the state energy department that meets the goals of the community and the requirements imposed by the regulator or statute.	Broker, Town Administrator or Energy Planner	Planner 2 months
Approve aggregation plan	Authorize plan to be filed with the state's public utilities commission.	City Council or Board of Selectmen	1 month
Submit aggregation plan to regulator	Petition the state public utilities commission to authorize the CCA.	Broker	6 months
Issue RFP for competitive supplier	Solicit competitive bids for the CCA contract.	Broker	1 month
Execute contract with supplier	Choose supplier for the CCA.	Town Administrator	N/A
Notify customers	Inform customers about the CCA and the opt-out period.	Broker	2 months
Begin automatic enrollment	Enroll standard service customers who have not opted out.	Utility	1 month

Source: Adapted from the Massachusetts Metropolitan Area Planning Council, “Start a Community Choice Aggregation Program” (April 16, 2014), available at: www.mapc.org/wp-content/uploads/2017/11/Start-a-Community-Choice-Aggregation-Program.pdf.

The Authority issued interrogatories to the EDCs to explore the potential costs should Connecticut adopt a CCA model. While the EDCs were unable to provide specific implementation cost estimates (because the specific design and business requirements of a Connecticut CCAs are unknown), each EDC addressed potential implementation costs in general terms. Eversource and UI Responses to Interrogatory CAE-18.

Eversource indicated that some level of costs would be incurred by the Company should CCAs be adopted in Connecticut, especially in the event that the adopted CCA model diverges from the existing competitive retail supply market or includes significant activities other than energy procurement. Eversource Response to Interrogatory CAE-15. Eversource asserted that requiring the EDCs to support new rate structures, bill presentment, alternative metering, or communications as part of CCA deployment would likely require costly system upgrades. *Id.* Further, Eversource cautioned that increased deployment of community managed DERs, particularly dispatchable active resources, could also have adverse system impacts and increase costs if not appropriately coordinated with EDC operations. *Id.*

UI stated it does not see any concerns with the adoption of CCAs at this time as long as it’s an opt-in program. UI Response to Interrogatory CAE-15. If an opt-out CCA model is adopted, however, UI would need to perform system modifications and develop procedures, although the complexity and costs of any such changes are unknown at this time given the lack of additional detail. *Id.*; UI Response to Interrogatory CAE-18. From a billing perspective, UI stated that if a CCA supplier would look like any other supplier, the Company’s current billing system would be able to handle the billing with no changes. UI Response to Interrogatory CAE-17.

Finally, while it is premature to attempt to quantify specific costs of CCA adoption that would be incurred by EDCs, ultimately, consideration must be made with respect to how those costs would be recovered from ratepayers. An opt-in CCA model that only permits a CCA to procure electric supply for the communities it serves would have the least cost impact to the EDCs. Under that scenario, a CCA would operate similar to other third-party electric suppliers, which EDC billing systems can already accommodate in today’s environment. If an opt-out model is preferred, however, the EDCs indicated that there would be costs incurred to develop procedures and to modify systems. Further, a CCA model that allows for a broader scope of services would likely have an impact on existing EDC operations, likely resulting in increased costs. Measures exist elsewhere that may mitigate or inform cost recovery issues, such as the imposition of a so-called “exit fee” wherein electric utilities charge customers who switch from default supply service to join a CCA. NREL Study, pp. 21-22. While such exit fees are historically contemplated in regulated markets, *Id.*, the general design principal may be adaptable.

An in-depth analysis of the degree of potential costs to accommodate CCAs in Connecticut, and who is responsible for incurring those costs, is beyond the scope of this Study, but should be considered in any final determination regarding implementation of CCAs in Connecticut.

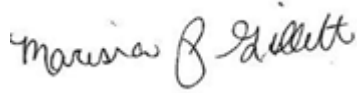
IV. CONCLUSION

Since Massachusetts first enacted CCA-enabling legislation in 1997, a total of nine state legislatures have passed laws allowing for CCA. Indeed, the CCA model has evolved and expanded over time. While the spectrum of CCA models operating in other jurisdictions is instructive, community choice aggregation would ultimately need to be adapted to and integrated with Connecticut's restructured energy market. Further, additional consideration is warranted regarding any potential program implementation costs – including the magnitude of such costs and who would bear them – both of which are dependent on the ultimate CCA program design adopted by the State.

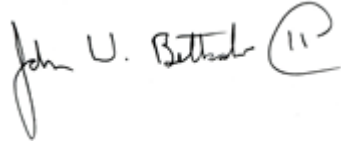
Ultimately, this Study does not reach a definitive conclusion as to whether CCA would be appropriately promulgated in the State; rather, it identifies a number of factors that should be considered by the General Assembly when evaluating CCA as an option for Connecticut electricity consumers. In short, the Authority respectfully advises that given the range of potential CCA frameworks, enabling legislation should seek to identify – and if possible, prioritize – the desired public policy objectives that a resulting CCA program should be designed to achieve. Doing so would inform subsequent program design considerations, permitting interested stakeholders to recommend a program implementation plan that best achieves the stated objectives while allowing the Authority to balance the interests of both CCA participants and non-participants. Lastly, the General Assembly may wish to give due consideration to the degree and duration of oversight that it wishes the Authority to exercise over a potential CCA program, as important consumer protection issues are potentially invoked by adoption of CCA in Connecticut. Given the potential effects on standard service and other State energy issues, the Authority respectfully opines that a similar degree of oversight to that which it exercises over the third-party electric supplier market may be warranted.

DOCKET NO. 20-05-13 PURA STUDY OF COMMUNITY CHOICE AGGREGATION

This Decision is adopted by the following Commissioners



Marissa P. Gillett



John W. Betkoski, III



Michael A. Caron

CERTIFICATE OF SERVICE

The foregoing is a true and correct copy of the Decision issued by the Public Utilities Regulatory Authority, State of Connecticut, and was forwarded by Certified Mail to all parties of record in this proceeding on the date indicated.



Jeffrey R. Gaudiosi, Esq.
Executive Secretary
Public Utilities Regulatory Authority

November 3, 2021

Date